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9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ANGELA MADRIGAL CHAVEZ,

15 Defendant.

Case No.: 4:22-cr-06041-MKD-3

Motion for Detention

16
17 The United States moves for pretrial detention of Defendant, pursuant to 18
19 U.S.C. § 3142(e) and (f).

20 1. Eligibility of Case

21 This case is eligible for a detention order because the case involves (check
22 one or more):
23

24 ☐ Crime of violence (as defined in 18 U.S.C. § 3156(a)(4) which
25 includes any felony under Chapter 77, 109A, 110 and 117);
26

27 ☐ A violation of 18 U.S.C. § 1591;
28

1 ☐ An offense listed in 18 U.S.C. § 2332b(g)(5)(B) with maximum
2 penalty of 10 years or more;
3

4 ☐ Maximum penalty of life imprisonment or death;

5 ☒ Drug offense with maximum penalty of 10 years or more;
6

7 ☐ Felony, with two prior convictions in above categories;
8

9 ☐ Felony that involves a minor victim or that involves the possession or
10 use of a firearm or destructive device as those terms are defined in 18 U.S.C. §
11 921, or any other dangerous weapon, or involves a failure to register under 18
12 U.S.C. § 2250;
13

14 ☒ Serious risk Defendant will flee (as specified below); or
15

16 ☐ Serious risk obstruction of justice (as specified below).
17

18 The defendant has substantial travel and family ties to Mexico and has an
19 unverifiable living situation and unverifiable employment.
20

21 2. Reason for Detention

22 The Court should detain Defendant because there is no condition or
23 combination of conditions which will reasonably assure (check one or both):
24

25 ☒ Defendant's appearance as required; or

26 ☒ Safety of any other person and the community.
27
28

3. Rebuttable Presumption.

The United States

☒ will

☐ will not

invoke the rebuttable presumption against Defendant under 18 U.S.C. § 3142(e).

If the United States is invoking the presumption, it applies because there is probable cause to believe Defendant committed:

☒ Drug offense with maximum penalty of 10 years or more;

☐ An offense under 18 U.S.C. §§ 924(c), 956(a), or 2332b;

☐ An offense under 18 U.S.C. § 2332b(g)(5)(B) for which a maximum term of imprisonment of 10 years or more is prescribed;

☐ An offense under chapter 77 of Title 18, United States Code, for which a maximum term of imprisonment of 20 years or more is prescribed;

☐ An offense involving a minor victim under 18 U.S.C. §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1), 2252(a)(2), 2252(a)(3), 2252A(a)(1), 2252A(a)(2), 2252A(a)(3), 2252A(a)(4), 2260, 2421, 2422, 2423, or 2425;

☐ Other circumstances as defined in 18 U.S.C. § 3142(e)(2).

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1 4. Time for Detention Hearing

2 The United States requests that the Court conduct the detention hearing:

3
4 ☐ At the first appearance, or

5 ☒ After a continuance of three days.

6
7 5. No Contact Order

8 The United States further requests, in addition to pretrial confinement, that
9
10 Defendant be subject to the following condition:

11 Defendant shall have no contact whatsoever, direct or indirect, with any
12
13 persons Defendant knows or reasonably should know are or may become a victim
14 or potential witness in the subject investigation or prosecution. Prohibited forms of
15 contact include, but are not limited to, telephone, mail, email, text, video, social
16 media, and/or any contact through any third person or parties.

17
18 Dated: December 8, 2022.

19
20 Vanessa R. Waldref
21 United States Attorney

22 s/ Stephanie Van Marter
23 Stephanie Van Marter
24 Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Defendant's counsel of record, if any have been appointed or retained.

s/ Stephanie Van Marter
Stephanie Van Marter
Assistant United States Attorney